

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: OPENAI, INC.,  
COPYRIGHT INFRINGEMENT LITIGATION

This Document Relates To:

All Actions

Civil Action No. 25-md-3143 (SHS) (OTW)

**NOTICE OF MOTION TO APPOINT THE  
JOSEPH SAVERI LAW FIRM, LLP AS  
INTERIM LEAD COUNSEL FOR THE  
CONSOLIDATED CLASS CASE UNDER FED.  
R. CIV. P. 23(G)(3)**

PLEASE TAKE NOTICE that Plaintiffs Paul Tremblay, Christopher Golden, Sarah Silverman, Richard Kadrey, Ta-Nehisi Coates, Junot Díaz, Andrew Sean Greer, David Henry Hwang, Matthew Klam, Laura Lippman, Rachel Louise Snyder, Jacqueline Woodson, Nicholas Basbanes, and Nicholas Gage jointly move this Court before the Honorable Sidney H. Stein, United States District Judge, at the United States District Court for the Southern District of New York, 40 Foley Square, New York, NY 10007, for an order appointing Joseph R. Saveri and his firm, The Joseph Saveri Law Firm, LLP, as interim lead counsel for the consolidated class pursuant to Fed R. Civ. P. 23(g).

In support of the motion, the above-referenced plaintiffs will rely on the accompanying memorandum of law, the Declaration of Joseph R. Saveri and accompanying exhibit, and any other written or oral argument as may be requested or permitted by the Court.

Dated: May 28, 2025

/s/ Joseph R. Saveri  
Joseph R. Saveri  
JOSEPH SAVERI LAW FIRM LLP  
601 California Street, Suite 1505  
San Francisco, CA 94108  
Telephone: (415) 500-6800  
jsaveri@saverilawfirm.com

*Attorney for Paul Tremblay, et al*

/s/ David Boies \_\_\_\_\_

David Boies  
BOIES SCHILLER FLEXNER LLP  
333 Main Street  
Armonk, NY 100504  
Telephone: (914) 749-8201  
dboies@bsfllp.com

*Attorney for Paul Tremblay, et al*